



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

April 18, 2013

**CERTIFIED MAIL**

Judy McFarland  
Warren Fabricating & Machining Corporation  
7845 Chestnut Ridge Road  
P.O. Box 1032  
Warren, OH 44482

RE: CERTIFIED WARNING LETTER - Failure to comply with reporting requirements  
RESOLUTION OF VIOLATION - Failure to comply with reporting requirements  
Facility ID: 0278030797  
Facility: Warren Fabricating & Machining Corporation  
Location: Trumbull County

Dear Ms. McFarland:

On March 21, 2013, I conducted a full compliance evaluation of the Warren Fabricating facility located in Trumbull County. The purpose of the inspection was to evaluate compliance with the terms and conditions of the applicable operating permits that were issued on February 12, 2008. During the facility compliance evaluation, I interviewed you and Paul Musante, who is the facility's vice president, and the facility was inspected in your presence.

Listed below are "Findings" based upon Ohio EPA's observations and conversations with facility personnel. The "Findings" are followed by "Violation(s)" (if applicable) and "Requested Action(s)" necessary to address the stated findings and violations.

**Finding:**

Warren Fabricating & Machining Corporation failed to submit the following reports as required by their respective operating permits that were issued on February 12, 2008:

- 1) The following deviation reporting requirement is specific to emissions units F001 (Sand Blast Cleaning Area), P001 (Large Stress Relief Furnace), and R001 (Paint Area):
  - a) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which

have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2) The following reporting requirement is specific to F001:

- a) The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

3) The following reporting requirement is specific to emissions unit R001:

- a) The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

**Violation:**

Failure to submit the appropriate deviation reports, semiannual reports and annual reports are violations of OAC rule 3745-15-03, ORC 3704.05(C) and the terms and conditions of the permits associated with each emissions unit.

**Requested Action:**

Please immediately begin to submit the following reports per the operating permit for each emissions unit:

- For emissions units F001, P001, and R001, quarterly deviation reports that identify: (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit; (b) the probable cause of such deviations; and (c) any corrective actions or preventive measures which have been or will be taken. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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- For emissions unit F001, semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- For emissions unit R001, annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. These reports shall be submitted by April 15 of each year.

### **Resolution of Violations**

On April 15, 2013, this office received a quarterly deviation report indicating that no deviations had occurred during the first quarter of 2013 for emissions units F001, P001 and R001. During the compliance evaluation, we discussed the compliance requirements of the facility and you indicated that you have been recently hired by Warren Fabricating to ensure environmental compliance. Based on the records reviewed during the inspection and the corrective actions taken to bring the source(s) into compliance, the referenced violations are considered resolved. Please note, however, that this does not preclude Ohio EPA's authority from seeking civil penalties pursuant to ORC section 3704.06 for these violations. The decision on whether to pursue or decline to pursue such penalties regarding this matter is dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

Should you have any questions pertaining to the information presented in this letter, please contact me at (330) 963-1216 or [corey.kurjian@epa.ohio.gov](mailto:corey.kurjian@epa.ohio.gov).

Sincerely,



Corey Kurjian  
Environmental Specialist  
Division of Air Pollution Control  
Northeast District Office

CK:bo

ec: Tim Fischer, DAPC-NEDO